

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

PAMELA RAMOS,

*Plaintiff,*

v.

STATE OF ALABAMA, *et al.*,

*Defendants.*

CIVIL ACTION  
NO:07cv293-MHT

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on May 2, 2007, by email and telephone and was attended by:

A. Appearing on behalf of Plaintiff:

Russell W. Adams, Esq.  
Wiggins, Childs, Quinn & Pantazis, LLC  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203  
(205) 314-0500

B. Appearing on behalf of Defendants:

Alice Ann Byrne, Esq.  
STATE PERSONNEL DEPARTMENT  
64 North Union Street  
Montgomery, Alabama 36104  
(334) 242-3450

2. **Pre-Discovery Disclosure.** The parties will exchange by June 15, 2007, the information required by Fed.R.Civ.P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects: The Plaintiff's allegations and the Defendant's defenses.

All discovery shall be commenced in time to be completed by May 1, 2008.

**Interrogatories:** Maximum of 25 Interrogatories by each party, including sub-parts, with responses due with 30 days after service.

**Requests for Production:** Maximum of 50 Requests for Production by each party, including sub-parts, with responses due within 30 days after service.

**Requests for Admissions:** Maximum of 15 Requests for Admission by each party to any other party, with responses due 30 days after service.

**Depositions:** Maximum of ten depositions by the Plaintiff and ten by the Defendant. Each deposition limited to a maximum of seven hours unless extended by agreement of parties.

**Expert Witnesses:** The parties shall comply with the following deadlines in regard to experts under Rule 26(a)(2):

Plaintiff's experts' reports will be due by November 15, 2007.  
Defendant's experts' reports will be due by January 15, 2008.

**Supplementations:** Supplementations under Rule 26(e) due within 30 days of learning of the need to supplement, but, in no event, less than 30 days before the close of discovery.

#### **4. Other Items.**

A. The Plaintiff shall have until August 15, 2007 to join any additional parties and to amend the pleadings.

B. The Defendant shall have until August 15, 2007 to join any additional parties and to amend the pleadings.

C. The parties do not request a conference with the Court before entry of the Scheduling Order.

D. The parties request a pretrial conference 30 days after a ruling on dispositive motions or 30 days after the deadline for filing dispositive motions, whichever is later.

E. All potentially dispositive motions must be filed by February 15, 2008.

F. Settlement cannot be evaluated before the completion of discovery.

G. Final lists of trial witnesses and exhibits under Rule 26(a)(3) should be due from the Plaintiff 30 days prior to trial and from the Defendant by 30 days prior to trial.

H. Parties should have ten days after service of final lists of witnesses and exhibits to list objections under Rule(a)(3).

I. The case should be ready for trial by July 2008. Trial is expected to last two days.

Respectfully submitted this 2<sup>nd</sup> day of May, 2007.

/s/ Russell W. Adams  
Attorney for Plaintiff

Address of Counsel:  
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/s/ Alice Ann Byrne  
ALICE ANN BYRNE (BYR 015)  
Attorney for Defendants

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